

SOMMER BARNARD PC  
Jeffrey J. Graham (JG 9617)  
One Indiana Square, Suite 3500  
Indianapolis, IN 46204

Attorney for Small Parts, Inc., Creditor

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

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In re:	:
	:
DELPHI CORPORATION, <i>et al.</i> ,	:
	:
Debtors.	:
	x

**OBJECTION BY SMALL PARTS, INC. TO NOTICE OF CURE AMOUNT  
WITH RESPECT TO EXECUTORY CONTRACT ON UNEXPIRED LEASE  
TO BE ASSUMED AND ASSIGNED IN CONNECTION WITH  
SALE OF STEERING AND HALFSHAFT BUSINESS**

Small Parts, Inc. ("Small Parts"), by counsel, hereby objects to the "Notice Of Cure Amount With Respect To Executory Contract On Unexpired Lease To Be Assumed And Assigned In Connection With Sale Of Steering And Halfshaft Business" (the "Steering & Halfshaft Cure Notice") filed by Delphi Corporation, *et al.*, debtors and debtors-in-possession (collectively, the "Debtors"). In support of its objection, Small Parts states as follows:

1. On or about January 23, 2008, the Debtors filed their Steering & Halfshaft Cure Notice asserting that the cure amount for Purchase Order Number SAG90J2634 (the "P.O.") with Small Parts was \$1,536.70.
2. Small Parts has reviewed its books and records relating to the P.O. and disagrees with the Debtors' asserted cure amount.
3. As evidenced by the invoices attached as **Exhibit A**, the cure amount for the P.O. should be \$7,599.77 and not \$1,536.70 as listed with Steering & Halfshaft Cure Notice.

4. Based on the foregoing, Small Parts objects to the Steering & Halfshaft Cure Notice and respectfully requests that the assumption and assignment of the P.O. be conditioned upon a cure payment of \$7,599.77 to Small Parts.

WHEREFORE, Small Parts respectfully requests that the Court enter an Order: (1) conditioning the assumption and assignment of the P.O. on the cure payment of \$7,599.77 rather than \$1,536.70 as incorrectly stated in the Steering & Halfshaft Cure Notice; and (2) granting Small Parts such other and further relief as the Court deems proper.

Dated: Indianapolis, Indiana  
January 31, 2008

SMALL PARTS, INC.,

By: /s/ Jeffrey J. Graham  
Jeffrey J. Graham (JG 9617)  
Admission *pro hac vice* pending

Sommer Barnard PC  
One Indiana Square, Suite 3500  
Indianapolis, IN 46204  
Telephone: (317) 713-3500  
Facsimile: (317) 713-3699

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**CERTIFICATE OF SERVICE**

I hereby certify that a true and accurate copy of the foregoing was served on the parties listed in, and via the delivery methods required by, the "Notice Of Motion For Order Pursuant To 11 U.S.C. §§ 105(a) And 502(c) Estimating Or Provisionally Allowing Claim Solely For Purposes Of Administration Of Discount Rights Offering" filed by counsel for the Debtors on January 30, 2008.

/s/ Jeffrey J. Graham